

1 Joseph R. Saveri (State Bar No. 130064)
2 Ronnie Spiegel (*pro hac vice*)
3 David H. Seidel (State Bar No. 307135)
4 Itak Moradi (State Bar No. 310537)
5 **JOSEPH SAVERI LAW FIRM, LLP**
6 601 California St. Suite 1505
7 San Francisco, CA 94108
8 Telephone: (415) 500-6800
9 Facsimile: (415) 395-9940
10 Email: jsaveri@saverilawfirm.com
11 rspiegel@saverilawfirm.com
12 dseidel@saverilawfirm.com
13 imoradi@saverilawfirm.com

14 *Interim Lead Counsel for Direct Purchaser Plaintiffs and the Proposed Class*

15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN FRANCISCO DIVISION**

18 IN RE: JUUL LABS, INC. ANTITRUST
19 LITIGATION

20 This Document Relates To:

21 ALL DIRECT PURCHASER ACTIONS

22 Case No. 3:20-cv-02345-WHO

23 **DECLARATION OF JOSEPH R. SAVERI IN
24 SUPPORT OF DIRECT PURCHASER
25 PLAINTIFFS' MOTION TO STRIKE**

26 Hon. William H. Orrick

27 DEMAND FOR JURY TRIAL

1 I, Joseph R. Saveri, declare as follows:

2 1. I am an attorney duly licensed to practice in the State of California. I am a partner and
3 founder of the Joseph Saveri Law Firm LLP (“JSLF”), interim lead counsel of record for Direct Purchaser
4 Plaintiffs and the Proposed Class (“Plaintiffs”) in the above-captioned action. I have personal knowledge
5 of the matters stated herein and if called upon, I can competently testify thereto. I make this declaration in
6 support of Direct Purchaser Plaintiffs’ Motion to Strike (“Motion”) pursuant to Civil Local Rule 7-2.

7 2. Attached hereto as **Exhibit A** is a true and correct copy of Exhibit 10 from the deposition
8 of Dr. Bryan Perry, taken on May 15, 2025.

9 3. Attached hereto as **Exhibit B** is a true and correct copy of transcript excerpts from the
10 deposition of Dr. Bryan Perry, taken on May 15, 2025.

11 4. Attached hereto as **Exhibit C** is a true and correct copy of an email titled “In re Juul Labs,
12 Inc. Antitrust Litigation, No. 3:20-cv-02345-WHO - Murphy Charts” from Daniel Cook to Joseph Saveri
13 and others, dated May 15, 2025.

14 5. Attached hereto as **Exhibit D** is a true and correct copy of a PDF named “Murphy Charts
15 2025.05.15.” The PDF was downloaded directly from the link provided in the email from Daniel Cook
16 referenced above in Paragraph 4 and comprises the new charts and opinions produced by Dr. Kevin
17 Murphy on May 15, 2025.

18 6. Attached hereto as **Exhibit E** is a true and correct copy of transcript excerpts from the
19 deposition of Dr. Murphy, taken on May 20, 2025.

20 7. Attached hereto as **Exhibit F** is a true and correct copy of an email from Joseph Saveri to
21 Daniel Cook and others, dated May 16, 2025.

22 8. If the Court were to allow the new charts and opinions of Dr. Murphy, Plaintiffs would
23 need to reopen Dr. Murphy’s deposition. Plaintiffs would also likely incur additional time and costs
24 associated with the work of experts to respond to any such new charts and opinions. Plaintiffs are prepared
25 to submit a cost reporting of the additional time and costs in the event they were to be incurred.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed on the 17th day
2 of June 2025 in San Francisco, California.

3 */s/ Joseph R. Saveri*
4 Joseph R. Saveri